

1 **TRAVIS E. SHETLER, ESQ.**
2 Nevada Bar No. 4747
3 **LAW OFFICE OF TRAVIS E. SHETLER, PC**
4 3202 W. Charleston Boulevard
5 Las Vegas, Nevada 89102
6 travis@shetlerlawfirm.com
7 (702) 931-9700 Telephone
8 *Pro Se*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 * * *

12 SEAN K. CLAGGETT & ASSOCIATES, LLC
13 D/B/A CLAGGETT & SYKES LAW FIRM, A
14 NEVADA LIMITED LIABILITY COMPANY;
15 SEAN K. CLAGGETT, AN INDIVIDUAL,

16 Plaintiff,

17 vs.

18 DON C. KEENAN, AN INDIVIDUAL; D.C.,
19 KEENAN & ASSOCIATES, P.A. D/B/A
20 KEENAN LAW FIRM, A GEORGIA
PROFESSIONAL ASSOCIATION; KEENAN'S
KIDS FOUNDATION, INC., D/B/A KEENAN
TRIAL INSTITUTE AND/OR THE KEENAN
EDGE, A GEORGIA NON-PROFIT
CORPORATION; BRIAN F. DAVIS, AN
INDIVIDUAL; DAVIS LAW GROUP, P.A., A
NORTH CAROLINA PROFESSIONAL
ASSOCIATION; DAVID J. HOEY, AN
INDIVIDUAL; TRAVIS E. SHETLER, AN
INDIVIDUAL; WILLIAM ENTREKIN, AN
INDIVIDUAL; DOES I-X; AND ROE
BUSINESS ENTITIES XI-XX, INCLUSIVE,

21 Defendants.

22 Case No.: 2:21-cv-02237-GMN-DJA

23 **DEFENDANT TRAVIS E. SHETLER'S**
JOINDER TO CO-DEFENDANTS'
KEENAN'S KIDS FOUNDATION, INC.
AND DAVID J. HOEY'S MOTION TO
DISMISS PLAINTIFFS' COMPLAINT

24 COME NOW, Defendant, TRAVIS E. SHETLER, pro se, and hereby submits his Joinder to
25 Co-Defendants', Keenan's Kids Foundation, Inc. and David J. Hoey's Motion to Dismiss Plaintiffs'
Complaint.

26 This Joinder is made and based upon the papers and pleadings on file herein, the Memorandum
27 of Points and Authorities attached to Co-Defendants' Petition, such other documentary evidence as
28 may be presented, and any oral arguments at the time of the hearing of this matter. This Defendant

1 expressly adopts and incorporates by reference herein, as if fully set out, all of the Points and
2 Authorities set forth in Co-Defendants' Petition for Removal and avers that the arguments apply
3 equally to this Defendant.

4 DATED this 14th day of February, 2022.

5 By: /s/ *Travis E. Shetler*

6 Travis E. Shetler, Esq.
7 Law Office of Travis E. Shetler, PC
8 Nevada Bar No. 004747
9 travisshetlerlaw@gmail.com
10 3202 W. Charleston Blvd.
11 Las Vegas, Nevada 89102
12 *Pro Se*

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CERTIFICATE OF SERVICE

2 I hereby certify that I am an employee of Law Office of Travis E. Shetler, PC, and that on
3 the 14th day of February, 2022, and pursuant to FCRP 5(b), a copy of the foregoing **DEFENDANT**
4 **TRAVIS E. SHETLER'S JOINDER TO CO-DEFENDANTS' KEENAN'S KIDS**
5 **FOUNDATION, INC. AND DAVID J. HOEY'S MOTION TO DISMISS PLAINTIFFS'**
6 **COMPLAINT** was served via the Court's CM/ECF system.

/s/ Michelle Yu

An Employee of Law Office of Travis E. Shetler, PC